



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION SITE REMEDIATION AND WASTE MANAGEMENT PROGRAM

401 East State Street

P.O. Box 420, Mail Code 401-05F

Trenton, New Jersey 08625-0420

Tel. (609) 633-1455

www.nj.gov/dep

PHILIP D. MURPHY
Governor

SHAWN M. LATOURETTE
Acting Commissioner

SHEILA Y. OLIVER
Lt. Governor

March 24, 2021

Sam Abdellatif
Land and Redevelopment Programs Branch
U.S. Environmental Protection Agency, Region 2
290 Broadway, 25th. Floor
New York, NY 10007-1866

Approval Letter: Response to NJDEP Comments – Site Investigation Summary PowerPoint Presentation Response to Comments (November 20, 2020 Comments)

RE: Amerada Hess Corp- Former Port Reading Refinery
EPA ID No. NJD045445483
750 Cliff Road
Woodbridge Twp, Middlesex County
PI#: 006148

Dear Mr. Abdellatif,

The New Jersey Department of Environmental Protection (Department) has completed a review of the Response to NJDEP Comments – Site Investigation Summary PowerPoint Presentation Response to Comments (November 20, 2020 Comments) submitted March 5, 2021. The document was submitted pursuant to the Site Remediation Reform Act (N.J.S.A. 58:10C-1 et seq.), the Administrative Requirements for the Remediation of Contaminated Sites (N.J.A.C. 7:26C), and the NJDEP Technical Requirements for Site Remediation at N.J.A.C. 7:26E. The Department hereby approves the document, effective the date of this letter.

Hess presented the “Site Investigation Summary PowerPoint Presentation” on June 29, 2020 in which data was presented pertaining to AOC 103: Fire Pits/ Fire Training Area. The Department provided comments regarding the information presented for AOC 103. Multiple comments and responses have been exchanged since then with the latest response from Hess (referenced document above) submitted March 5, 2021.

Furthermore, Hess submitted the “Marine Area RIW” on March 4, 2021 which contains data and proposed sampling pertaining to AOC 103: Fire Pits/ Fire Training Area. As of the date of this

letter, the Marine Area RIW dated March 2021 will serve as the most up to date investigation workplan for AOC 103.

Therefore, the Department approves this document with the understanding that all comments and future discussions regarding AOC 103: Fire Pits/Fire Training Area will be addressed in the correspondence relating to the 2021 Marine Area RIW submitted March 4, 2021. Please refer to the comments below pertaining to AOC 103 which should be addressed in any correspondence relating to the 2021 Marine Area RIW.

Response 1: The response is accepted.

Response 2: The response is conditionally accepted. Compared to the August 2020 well location figures, additional and modified well locations were provided in the 2021 Marine Area RIW. Refer to the 2021 Marine Area RIW draft comments that were provided via email on March 17, 2021. Future discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence.

Response 3: The response is conditionally accepted. The investigation borings and wells do not go into what appears to be a tanker area that could be associated with fire training in the 1969 and 1970 aerial photos. One well into this area near FA-1 and the wells around the No. 1 Landfarm may not characterize this area. Refer to the 2021 Marine Area RIW draft comments that were provided via email on March 17, 2021. Future discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence.

Response 4:

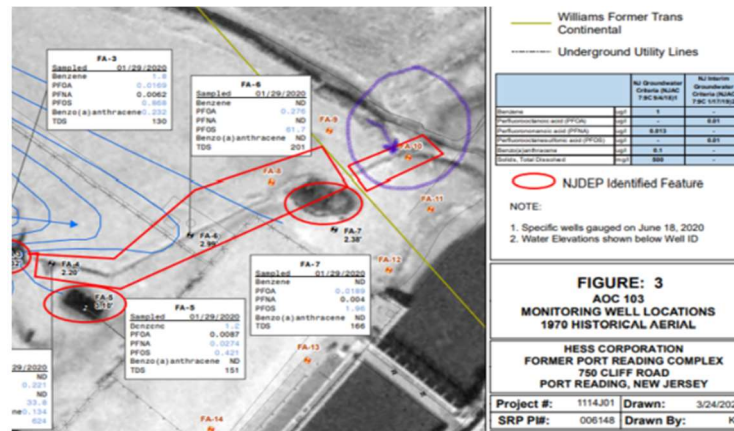
- Bullet 1: The response is accepted.

- Bullet 2: The response is conditionally accepted. Cross sections will be provided in the future CSM. Note: the section that was provided in the Marine Area RIW parallel to the Arthur Kill in the bulkhead area needs to be updated to reflect the boring log at FA-7 and the increase in gravel content. Finer distinctions from the boring logs, along with field screening observations, well completion intervals, data, etc. can help clarify ground water flow and contaminant migration. Future discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence.

- Bullet 3-5: The response is accepted.

Response 5:

- Bullet 1: The response is conditionally accepted. Please confirm whether monitoring well FA-10 (see circle and arrow) is in the drainage area (darkened area on figure). Future discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence.



- Bullet 2: The response is conditionally accepted. Soil and ground water sampling are proposed *around* the 1972 aerial photo feature that could be related to fire training. Soils and ground water sampling should be proposed *within* the 1972 aerial photo feature. Refer to the 2021 Marine Area RIW draft comments that were provided via email on March 17, 2021. Future discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence.
- Bullet 3: The response is conditionally accepted. Additional monitor wells are identified for delineation in the 2021 Marine Area RIW. However, these will not assess the darkened area near FA-7 as a source. Refer to the 2021 Marine Area RIW draft comments that were provided via email on March 17, 2021. Future discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence.

Response 6:

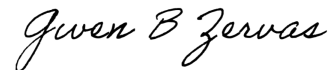
- Bullet 1: The response is accepted. Additional and modified well locations were shown in the 2021 Marine Area RIW and will help clarify flow conditions and evaluate additional COC migration paths. Refer to the 2021 Marine Area RIW draft comments that were provided via email on March 17, 2021. Future discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence.
- Bullet 2: The response is accepted. December 2020 flow conditions were provided in the 2021 Marine Area RIW which addresses the comment. However, there are similarities to the June 2020 flow conditions provided in the August 2020 response and the difference in elevations between FA-1/FA-2 and FA-3/FA-4 was even greater. Subsurface conditions should be further described with the proposed soil borings and wells to understand the influences on water level variations in this area. It is a concern that the meadow mat unit was not identified at FA-3 and FA-4 boring logs. That, with the elevation information, may indicate the potential for deeper migration paths. Future discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence.
- Bullet 3-5: The response is accepted.
- Bullet 6: The response is conditionally accepted. Tidal stage will be recorded when wells are sampled. Clarify the tidal stage measurement location, e.g., a stilling well on the Arthur Kill. Also, measuring tidal stage is not the same as a tidal influence evaluation which will be needed at locations near and further from the Arthur Kill. The most contaminated wells (FA-4, FA-6) should be included. Future

discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence.

Response 7: The response is conditionally accepted. The pipeline location of concern is the Colonial Pipeline. The location was updated on 2021 RIW figures, except on well location Figure 10. Well locations, gauging data and water quality data need to be evaluated with respect to potential barriers/preferential pathways. The depth of the pipeline is requested for consideration with 2021 Figure 10 FA-8 and FA-9 well locations. Refer to the 2021 Marine Area RIW draft comments that were provided via email on March 17, 2021. Future discussion regarding this matter should be addressed through the 2021 Marine Area RIW correspondence. Nothing in this correspondence affects Hess' potential liability and obligations to the State Trustee, the Department, or its Commissioner regarding natural resource injuries, restoration, or damages.

If you have any questions regarding this matter, contact Julia Galayda at Julia.Galayda@dep.nj.gov.

Sincerely,

A handwritten signature in black ink that reads "Gwen B Zervas". The script is cursive and fluid.

Gwen B. Zervas, P.E.
Section Chief

cc: Julia Galayda, Case Manager
John Virgie, LSRP, Earth Systems
Ann Charles, BEERA
Jill Monroe, BGWPA